

## UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

AROMAN PROMOTIONAL PRODUCTS, INC. and ROSIE MANKES,  
 individually and derivatively on behalf of  
 GURL2GURL PRODUCTIONS, INC. Plaintiff,

- against -

DENISE RESTAURI and GURL2GURL  
 PRODUCTIONS, INC. Defendant.

10 cv 952

## MOTION TO ADMIT COUNSEL

## PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, Stephen Kline, Esquire a member in good standing of  
 the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Vincent J. Restauri, Jr.  
 Firm Name: Vincent Restauri Law Offices  
 Address: 85 Firethorn Road  
 City/State/Zip: Baden, Pennsylvania 15005  
 Phone Number: 412.427.5914  
 Fax Number: 412.291.1123

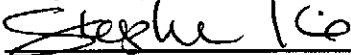
Vincent J. Restauri, Jr. is a member in good standing of the Bar of the States of  
 Pennsylvania

There are no pending disciplinary proceedings against  
 in any State or Federal court.

Dated: February 25, 2010

City, State: New York, NY

Respectfully submitted,



Sponsor's  
 SDNY Bar Stephen Kline, Esq. SK3395  
 Firm Name: Stephen Kline, Esq. P.C.  
 Address: 7618 6th Avenue  
 City/State/Zip: Brooklyn, NY 11209  
 Phone Number: 917.723.5044  
 Fax Number: 917.591.5652

SAMMY SPYRIDOULIAS  
 NOTARY PUBLIC, STATE OF NEW YORK  
 QUALIFIED IN NEW YORK COUNTY  
 NO. 01SP6188798  
 MY COMMISSION EXPIRES 06-16-2012



MAR 09 2010

JL 625-896645

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Plaintiff,

Aroman Promotional Products, Inc. and  
Rosie Mankes, individually and derivatively on  
behalf of Gurl2Gurl Productions, Inc.

**Case No. 10 CV 952**

-v-

Denise Restauri and Gurl2Gurl Productions, Inc.  
Defendant.

**AFFIDAVIT OF STEPHEN KLINE, ESQUIRE  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL PRO HAC VICE**

Stephen Kline , being duly sworn, hereby deposes and says as follows:

I am counsel for Defendants in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit Vincent J. Restauri, Jr. as counsel pro hac vice to represent Defendants in this matter.

I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1997. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

Denise Restauri, the Defendant, was a client of a company for whom I served as Counsel, and I have known her for more than a year. Vincent J. Restauri, Jr. is Denise's brother and I was introduced to him recently in response to this litigation. I have spoken with Vincent Restauri, about this litigation matter and his lengthy career and I have satisfied myself that:

He is a graduate of Yale University (1971), and Duquesne University Law School in Pittsburgh, Pennsylvania (1977). Upon graduation from law school, he served as judicial law clerk to the Honorable Herbert P. Sorg, Chief Judge, United States District Court for the Western District of Pennsylvania.. Mr. Restauri was admitted to the Bar of the Supreme Court of Pennsylvania in 1977 and to the Bar of the United States District Court for the Western District of Pennsylvania in 1978. In the mid-1980's he served as primary counsel to the two Standing Chapter 13 Trustees in the United States Bankruptcy Court for the Western District of Pennsylvania and appeared weekly in the Court to present and argue motions. He has practiced law full-time, exclusively,

and continuously, for over thirty years, mostly as a sole practitioner, in both State and Federal courts. He has never been the subject of any disciplinary proceeding by any court or board. He has served as lead trial counsel in a wide-variety of cases in the State and Federal courts. Lanham Act questions are the basis for Federal jurisdiction in the Complaint filed in this case, and Mr. Restauri has served as lead trial counsel in several Lanham Act cases within the last five years. In one of them, he appeared, *pro hac vice*, in the United States District Court for the District of New Jersey. Mr. Restauri has also appeared as lead trial counsel, *pro hac vice*, in the United States District Court for the District of Colorado. Mr. Restauri has never been an employee, officer, director, or shareholder in Defendant Gurl2Gurl Productions, Inc. His involvement in Gur2Gurl has been limited to advising the corporation on legal matters.

I have found Mr. Restauri to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

Accordingly, I am pleased to move the admission of Vincent J. Restauri, Jr., *pro hac vice*.

I respectfully submit a proposed order granting the admission of Vincent J. Restauri, Jr. *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Vincent J. Restauri, Jr., *pro hac vice*, to represent Defendants in the above captioned matter, be granted.

Dated: 2/25/2010

City, State: Notarized:

Respectfully submitted,



Stephen Kline  
SK3395  
Stephen Kline, Esq., P.C.  
7618 6th Avenue  
Brooklyn, NY 11209  
917.723.5044 P  
917.591.5652 F

SAMMY SPYRIDOULIAS  
NOTARY PUBLIC, STATE OF NEW YORK  
QUALIFIED IN NEW YORK COUNTY  
NO. 01SP6188798  
MY COMMISSION EXPIRES 06-16-2012





Supreme Court of Pennsylvania

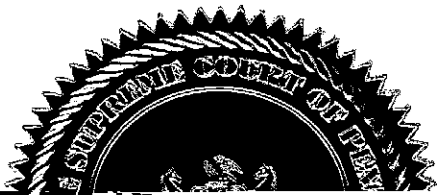
**CERTIFICATE OF GOOD STANDING**

***Vincent James Restauri, Jr., Esq.***

**DATE OF ADMISSION**

***October 18, 1977***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal  
Dated: February 23, 2010**

A handwritten signature, likely of the official, in dark ink.

A handwritten signature, likely of the official, in dark ink.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AROMAN PROMOTIONAL PRODUCTS, Plaintiff,  
INC. and ROSIE MANKES, individually and derivatively on behalf  
of GURL2GURL PRODUCTIONS, INC.

10 CV 952 ( )

- against -

DENISE RESTAURI and GURL2GURL  
PRODUCTIONS, INC.

ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION

Upon the motion of STEPHEN KLINE attorney for DENISE RESTAURI and GURL2GURL  
and said sponsor attorney's affidavit in support; PRODUCTIONS, INC., DEFENDANTS

**IT IS HEREBY ORDERED** that

Applicant's Name: Vincent J. Restauri, Jr.  
Firm Name: Vincent Restauri Law Offices  
Address: 85 Firethorn Road  
City/State/Zip: Baden, Pennsylvania 15005  
Telephone/Fax: T: 412.427.5914/ F: 412.291.1123  
Email Address: vince.restauri @ gmail.com

is admitted to practice pro hac vice as counsel for DENISE RESTAURI & GURL2GURL PROD. INC. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:  
City, State: New York, NY

\_\_\_\_\_  
United States District/Magistrate Judge

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Plaintiff,

Aroman Promotional Products, Inc. and  
Rosie Mankes, individually and derivatively on  
behalf of Gurl2Gurl Productions, Inc.

**Case No. 10 CV 952**

-v-

Denise Restauri and Gurl2Gurl Productions, Inc.  
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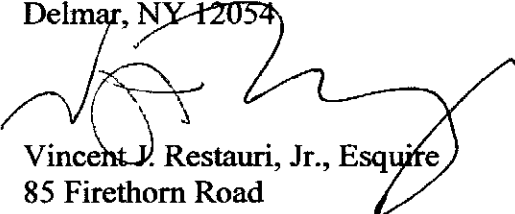
**PROOF OF SERVICE**

I, Vincent J. Restauri, Jr., hereby certify that on February 25, 2010 I served true and correct copies of the foregoing documents:

Motion of Stephen Kline, Esquire to Admit Vincent J. Restauri, Jr., Pro Hac Vice,  
Affidavit of Stephen Kline, Esquire, in support of said Motion,  
Certificate of Good Standing from the Supreme Court of Pennsylvania, and  
Proposed Order of Court granting said Motion, as follows:

BY EMAIL and BY FIRST-CLASS US MAIL, postage-prepaid, addressed as follows:

Jeremiah F. Manning, Esquire  
Manning, Esq. Law Offices  
49 Oldox Road  
Delmar, NY 12054



Vincent J. Restauri, Jr., Esquire  
85 Firethorn Road  
Baden, PA 15005  
T: 412.427.5914  
F: 412.291.1123  
vince.restauri @ gmail.com  
February 25, 2010